

Exhibit 2

Kevin Smith

From: Melissa Baily
Sent: Friday, April 28, 2017 11:33 AM
To: Kevin Smith
Subject: FW: Waymo v. Uber; privilege logs
Attachments: Uber_Priv_Log_Stroz_Report.pdf

From: Rivera, Sylvia [mailto:SRivera@mofo.com]
Sent: Friday, April 28, 2017 10:59 AM
To: Melissa Baily <melissabaily@quinnemanuel.com>
Cc: QE-Waymo <qewaymo@quinnemanuel.com>; UberWaymo <UberWaymo@mofo.com>; 'BSF_EXTERNAL_UberWaymoLit@bsfllp.com' (BSF_EXTERNAL_UberWaymoLit@bsfllp.com) <BSF_EXTERNAL_UberWaymoLit@bsfllp.com>; Gonzalez, Arturo J. <AGonzalez@mofo.com>
Subject: RE: Waymo v. Uber; privilege logs

Melissa,

As stated in the redacted version of the log for the report prepared by Stroz Friedberg LLC (which redacted the Stroz Friedberg name), to Uber's knowledge the only recipients of the report and attachments are the firms listed in the Recipient(s) column and Uber's in-house counsel, Ottomotto's in-house counsel, and Outside Counsel of Record.

From meeting and conferring with your colleagues, I understand that Waymo wants the log to identify individual recipients, and we've been pulling together that information. Attached as the last page of the log is a table that lists the individuals at each firm, Uber, and Otto who received the report before the complaint in this action was filed. Please note that most of the recipients listed for Morrison & Foerster did not see the report until after the arbitration commenced in October 2016. The names of individuals from Stroz Friedberg are those we believe contributed to or received the report.

Regards,
Sylvia

From: Gonzalez, Arturo J.
Sent: Friday, April 28, 2017 9:26 AM
To: Melissa Baily
Cc: Rivera, Sylvia; QE-Waymo; UberWaymo; 'BSF_EXTERNAL_UberWaymoLit@bsfllp.com' (BSF_EXTERNAL_UberWaymoLit@bsfllp.com)
Subject: Waymo v. Uber; privilege logs

We will be responding to you this morning.

Sent from my iPhone

On Apr 28, 2017, at 8:48 AM, Melissa Baily <melissabaily@quinnemanuel.com> wrote:

- External Email -

Sylvia,

We reiterate our request that Defendants immediately send the un-redacted log describing the due diligence report and its attachments. If you sent it before noon yesterday as was required by the Court's Order and we missed it, please point us to it.

Thanks, Melissa

----- Original message -----

From: Melissa Baily <melissabaily@quinnemanuel.com>

Date: 04/27/2017 7:36 PM (GMT-08:00)

To: "Rivera, Sylvia" <SRivera@mofo.com>, QE-Waymo <gewaymo@quinnemanuel.com>

Cc: UberWaymo <UberWaymo@mofo.com>, "'BSF EXTERNAL UberWaymoLit@bsflp.com' (BSF_EXTERNAL_UberWaymoLit@bsflp.com)'" <BSF_EXTERNAL_UberWaymoLit@bsflp.com>

Subject: RE: Waymo v. Uber; privilege logs

Sylvia,

Defendants were under a Court Order to produce "a privilege log complete as to all items, including those affected by Levandowski's Fifth Amendment motion" at noon today. The same order dictates that Waymo is to file any motion to compel the due diligence report and its attachments by noon on Monday.

Defendants do not appear to have produced an un-redacted version of the log describing the due diligence report and its attachments, and we read your email to indicate that Defendants are withholding that log in direct violation of the Court's Order (obviously prejudicing Waymo's ability to make any motion on Monday). Defendants need to produce that log immediately.

Separately, in the un-redacted logs that have been produced, we see that some of the authors still refer to institutions – Stroz Friedberg, Morrison & Foerster, etc. – rather than individuals. We had understood that Defendants were remedying this issue – is our understanding correct? If so, when are Defendants planning to provide this information?

We reserve all rights regarding Defendants’ continued failure to provide the privilege logs required by the Court’s Orders.

Regards,
Melissa

From: Rivera, Sylvia [<mailto:SRivera@mofo.com>]
Sent: Thursday, April 27, 2017 1:31 PM
To: QE-Waymo <qewaymo@quinnemanuel.com>
Cc: UberWaymo <UberWaymo@mofo.com>; 'BSF_EXTERNAL_UberWaymoLit@bsfillp.com' (BSF_EXTERNAL_UberWaymoLit@bsfillp.com)'
<BSF_EXTERNAL_UberWaymoLit@bsfillp.com>
Subject: Waymo v. Uber; privilege logs

Quinn Team,

Today we forwarded unredacted, amended versions of Defendants’ initial, supplemental, and second supplemental privilege logs associated with the March 31, 2017 production. We revised those logs consistent with Arturo Gonzalez’s email of April 25, 2017. Among other things, we revised the log of documents at Uber (second supplemental log) to now list the individual custodians for each document and to list the author for email attachments; revised the “subject matter of communication” to more specifically address the “anticipated litigation”; revised certain entries to address your objection to use of the disjunctive “and/or”; removed from the log certain documents that were non-responsive; and attempted to place the Morrison & Foerster LLP and O’Melveny & Myers log entries in chronological order.

As noted in Mr. Gonzalez’s April 25 email, for each email log entry that constitutes one email in an email string, we will review the email strings and note the names of any additional senders/recipients who are not already listed in the log entry. Given the volume of log entries, that potentially could take up to two weeks to complete for all logs. We will endeavor to provide you with the updated logs on a rolling basis. Of course, based on our review, most of the earlier emails in any email string already appear on the logs as stand-alone log entries, so you already have most of that information in the existing logs.

Last, we are attempting to address your concerns as they would apply to the supplemental log of Morrison & Foerster documents that run through the date of the filing of the complaint in this action and the stand-alone log of the investigative report. We expect to produce those tomorrow.

Regards,
Sylvia

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